



November 10, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte Communication; PS Docket No. 15-94

Dear Ms. Dortch:

On November 8, 2016, Kelly Williams and the undersigned of the National Association of Broadcasters (NAB), participated in a teleconference call with Gregory Cooke, Steven Carpenter, Brenda Boykin, Jane Kelly, Austin Randazzo, and Jessica Krentz of the Public Safety and Homeland Security Bureau. The Bureau requested the call with NAB to discuss various issues raised in the pending Notice in the above-captioned proceeding.¹

Regarding multilingual alerting, NAB expressed our understanding that broadcasters can receive and decode emergency alert system (EAS) warnings issued using the common alerting protocol in both English and Spanish, and retransmit those messages in their original language. We reiterated our view that multilingual alerting is best achieved by the issuance of alerts in multiple languages by alert originators, rather than requiring broadcasters to translate alerts into non-English languages.

Regarding text to speech (TTS) technology that could improve the accessibility of alerts for persons with disabilities, NAB stated that broadcasters are using TTS now to meet the current audible crawl requirements. However, we are not aware of the state of non-English TTS technology. We also discussed the challenges of local pronunciation in certain languages that could cause public confusion. Multilingual TTS technology may not be able to capture the context and nuances inserted by EAS participants. Finally, we explained that it could be expensive for broadcasters to implement multilingual TTS technology. There would be more involved than simply purchasing the technology; a station would have to extract the information from the alert, possibly reformat the textual information to interact with other studio equipment, and ensure a reliable workflow for the alert. The better approach is for

¹ *Amendment of Part 11 of the Commission's Rules Regarding the Emergency Alert System*, Notice of Proposed Rulemaking, PS Docket No. 15-94, 31 FCC Rcd 594) (2016) (Notice).

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alert originators to issue alerts in the preferred languages for automated retransmission by broadcasters.

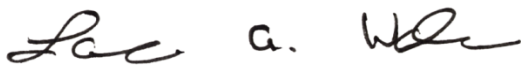
Regarding equipment updates, NAB stated that EAS equipment typically has a long shelf-life, and if it malfunctions, can usually be repaired by the manufacturer. Otherwise, such equipment can often last twenty years or more. We also explained that there is no set timetable for updating equipment; broadcasters merely implement software updates as directed by the manufacturers. The costs of replacing equipment can be a substantial burden on smaller radio stations, while the costs of software updates are typically minimal.

Regarding false alerts, NAB stated that the Commission's proposal in the Notice to require an initial report within thirty minutes is unreasonable. We explained that such an obligation would only distract station staff from correcting the problem at hand. We also explained that the Commission's proposal to make public the fact that a station filed a false alert report served no apparent purpose, and would needlessly embarrass stations.

Regarding security certification, NAB explained that the Commission's proposed requirement that all EAS participants certify compliance with certain EAS security measures grossly underestimates the resources necessary. We stated that many stations would have to hire an outside IT consultant, and engage an attorney to help ensure the accuracy of their certification. We stated our understanding that broadcasters already invest the time and resources to monitor and check the security of all their systems and equipment, including EAS, and that an annual certification obligation would be an expensive, unnecessary burden.

Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Larry Walke". The signature is fluid and cursive, with the first name "Larry" and last name "Walke" clearly distinguishable.

Larry Walke

cc: Gregory Cooke
Steven Carpenter
Brenda Boykin
Jane Kelly
Austin Randazzo
Jessica Krentz